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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTOPHER J. HADNAGY, an
individual; and SOCIAL-ENGINEER, LLC, a
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON
COMMUNICATIONS, INC., a Washington
corporation; and DOES 1-10; and ROE
ENTITIES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-01345-CDS-BNW

**DECLARATION OF KRISTOFER
RIKLIS, ESQ. IN SUPPORT OF
PLAINTIFFS' RESPONSE IN
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS THE
COMPLAINT FOR LACK OF
PERSONAL JURISDICTION [ECF NO.
13]**

**DECLARATION OF KRISTOFER RIKLIS, ESQ. IN SUPPORT OF
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS TO
DISMISS THE COMPLAINT FOR LACK OF PERSONAL JURISDICTION
[ECF NO. 13]**

I, Kristofer Riklis, Esq., declare as follows:

1. I am an attorney duly licensed to practice law in the State of Nevada and am the Owner of Riklis Law, PLLC, counsel of record to Plaintiffs Christopher J. Hadnagy and Social-Engineer, LLC in the above-referenced matter.

2. This Declaration is made in support of Plaintiffs' Response in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction only.

3. True and correct printouts of screenshots of the "FAQ" Section of Defendants' Website at <https://defcon.org/html/links/dc-faq/dc-faq.html> (accessed October 15, 2023) are attached hereto as "Exhibit 1."

4. True and correct printouts of screenshots of the "Forums" Section of Defendants' Website at <https://forum.defcon.org> (accessed October 15, 2023) are attached hereto as "Exhibit 2." Clicking on the "Def Con Forums" link on Def Con's "Home" page located on Page 12 leads to Page 13, which shows all the forums for Def Con Planning. Clicking on the "Def Con 31 Planning" link leads to a page with all of the Sub-Forums dedicated to all of Def Con's activities.

5. True and correct printouts of screenshots of the "Book a Room" section of Defendants' Website at <https://defcon.org> (accessed October 15, 2023) are attached hereto as "Exhibit 3." Clicking on the "Book a Room!" link on the "Home" page located on Page 23 leads to Pages 24-25, which shows all the hospitality room blocks reserved for Def Con 2024. Clicking on the date range shows the "Event Dates" as seen on Page 25. Clicking on "Search" brings up the various hotel options seen on pages 26-30.

6. True and correct printouts of screenshots of the link to the "Open Calls" and Style Guide Section of Defendants' Website at <https://defcon.org> (accessed October 15,

2023) are attached hereto as “Exhibit 4.” Clicking on the “Open Calls” link on the “Home” page located on Page 33 leads to Page 34, which shows all the different “Calls” applicable to the Event. For example, Clicking on the “Call for Exhibitors” provides real-time information as to the acceptance period of the calls and provides in-depth information on how to contribute in various methods at the Event on Pages 35-38.

7. True and correct printouts of screenshots of the link to the “Recent News” Section of Defendants’ Website at <https://defcon.org/html/links/dc-news.html> (accessed October 15, 2023) are attached hereto as “Exhibit 5.”

8. True and correct printouts of screenshots of the link to the “Get Involved” Section of Defendants’ Website at <https://defcon.org/html/links/get-involved.html> (accessed October 15, 2023) are attached hereto as “Exhibit 6.”

9. Each page of Defendants’ website at www.defcon.org bear a copyright notation of either “© 1992-2023 Def Con Communications, Inc. All Rights Reserved” or “(r) DEF CON Communications, Inc. and each screenshot exhibits the related URL. These are included on the last page of the exhibits.

DATED: June 23, 2023

/s/ Kristofer Riklis
Kristofer Riklis

INDEX OF EXHIBITS

<u>Exhibit</u>	<u>Title</u>	<u>Page Numbers</u>
1	Def Con Website: FAQ Section	01-10
2	Def Con Website: Forums Section	11-20
3	Def Con Website: Hotel Room Block	21-31
4	Def Con Website: Open Calls and Guide	32-39
5	Def Con Website: Def Con Cancelled	40-42
6	Def Con Website: Get Involved	43-45

CERTIFICATE OF SERVICE

I, Kristofer Riklis, hereby certify that the foregoing:

**DECLARATION OF KRISTOFER RIKLIS, ESQ. IN SUPPORT OF
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO
DISMISS THE COMPLAINT FOR LACK OF PERSONAL JURISDICTION [ECF
NO. 13].**

was submitted electronically for filing and/or service with the United States District Court, District
of Nevada's e-filing system on the 16th day of October, 2023. Electronic service of the foregoing
document was be made in accordance with the E-Service List as follows:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof,
postage prepaid, addressed to: N/A

/s/ Kristofer Riklis
KRISTOFER RIKLIS, Esq.